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**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Case No. 3:20-cr-00242-JO**

**Plaintiff,**

**DECLARATION OF**  
**BRYAN FRANCESCONI IN SUPPORT**  
**OF UNOPPOSED FIRST MOTION TO**  
**CONTINUE TRIAL DATE**

**v.**

**ZACHARY ROY DUFFLY,**

**Defendant.**

I, Bryan Francesconi, declare:

1. I am the attorney appointed to represent Zachary Roy Duffly in the above-entitled case.

2. A jury trial in this case is currently scheduled for September 22, 2020. Mr. Duffly was arraigned on July 21, 2020. This is the first continuance sought by the defense.

3. Mr. Duffly is currently on release and in compliance with the conditions thereof.

4. Mr. Duffly has received discovery and the defense is conducting investigation in his case, including obtaining video of his alleged altercation. Mr. Duffly is also awaiting additional discovery from the Government. Mr. Duffly therefore respectfully requests that this Court continue his case for a period of approximately 120 days to January 22, 2020, or a date thereafter convenient to the Court to accomplish these tasks.

5. I have discussed with Mr. Duffly his right to a speedy trial. He agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act. Assistant United States Attorney Parakram Singh has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on September 15, 2020 in Portland, Oregon.

/s/ Bryan Francesconi

Bryan Francesconi  
Assistant Federal Public Defender